

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

In Re: Samuel E. Miller,	:	Bankruptcy Case No.: 19-21086-JAD
	:	
Debtor.	:	Chapter 13
Ronda J. Winnecour,	:	
Chapter 13 Trustee	:	
	:	Document No.:
Movant,	:	
	:	Related to Document No.: 175, 176
v.	:	
	:	
Samuel E. Miller,	:	Hearing Date and Time:
	:	May 1, 2024 at 10:00 a.m.
Respondent.	:	

DEBTOR'S RESPONSE TO TRUSTEE'S MOTION TO DISMISS

AND NOW, comes Debtor, Samuel E. Miller, by and through his undersigned Counsel, Brian C. Thompson, Esquire, Thompson Law Group, P.C., and files this Response to Trustee's Motion to Dismiss, and represent as follows:

1. Paragraph 1 is admitted.
2. Paragraph 2 is admitted.
3. Paragraph 3 is admitted.
4. Paragraph 4 is admitted.
5. Paragraph 5 is admitted.
6. Paragraph 6 is admitted.
7. Paragraph 7 is admitted
8. Paragraph 8 is admitted. By way of further response, Debtor intends to file a Motion for Hardship discharge. Debtor suffered a stroke in November 2022 which left him unable to work for several months, and he remains on restricted duty at his job. Debtor has applied for Social Security Disability benefits as a result of his stroke but has not begun receiving them. Debtor is waiting to receive copies of his medical records to support his Motion for Hardship Discharge.

WHEREFORE, Debtor respectfully requests that the Trustee's Motion to Dismiss be denied.

Respectfully submitted:

Date: April 15, 2024

/s/Brian C. Thompson, Esquire
Brian C. Thompson
PA ID: 91197
Thompson Law Group, P.C.
301 Smith Drive, Suite 6
Cranberry Township, PA 16066
(724) 799-8404 Telephone
(724) 799-8409 Facsimile
bthompson@thompsonattorney.com